

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

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MOOG INC.,

Plaintiff,

Case No.: 22-cv-187-LJV-JJM

vs.

SKYRYSE, INC. ROBERT ALIN PILKINGTON, MISOOK  
KIM, and DOES NOS. 1-50

Defendants.  
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**DECLARATION OF ANTHONY D. GREEN IN SUPPORT OF ROBERT ALIN  
PILKINGTON AND MISOOK KIM'S MEMORANDUM OF LAW IN OPPOSITION TO  
PLAINTIFF'S MOTION TO COMPEL DISCOVERY FOR TRADE SECRET  
IDENTIFICATION**

Anthony D. Green, under penalty of perjury and pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a member of Winget Spadafora & Schwartzberg, LLP, counsel to Defendants Robert Alin Pilkington and Misook Kim (collectively, the "Individual Defendants").

2. I submit this Declaration in support of the Individual Defendants' Memorandum of Law in Opposition to Plaintiff's Motion to Compel Discovery for Trade Secret Identification, filed on August 17, 2022.

3. Annexed hereto as Exhibit A is a true and correct copy the June and July 2022 email communications between the Individual Defendants, Plaintiff, Skyryse, and iDS regarding excising pre-2021 communications from the Individual Defendants' devices.

4. Annexed hereto as Exhibit B is a true and correct copy of Plaintiff's First Set of Requests for Production of Documents and Things to Robert Alin Pilkington and Misook Kim served on March 21, 2022.

5. Annexed hereto as Exhibit C is a true and correct copy of the July 20, 2022 email communications between the Individual Defendants, Plaintiff, Skyryse, and the Court concerning the excision of pre-2021 communication from the Individual Defendants' personal devices.

6. As set forth herein, and as argued through the accompanying memorandum of law, the Individual Defendants respectfully request that Plaintiff's Motion is denied.

Dated: August 17, 2022  
New York, New York

/s/ Anthony D. Green  
Anthony D. Green